

**ORAL ARGUMENT REQUESTED**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

*Britney Rudler, on behalf of herself and all  
others similarly situated,*

*Plaintiff,*

v.

MLA Law Offices, LTD, and John L.  
Malevitis,

*Defendants.*

**NOTICE OF MOTION**

**19-CV-2170 (ERK) (LB)**

**PLEASE TAKE NOTICE** that, per the Court's Minute Order of Aug. 10, 2022 and the related Order at ECF No. 100, and upon the Memorandum of Law and the Declaration submitted herewith, on August 31, 2022, Plaintiff will move before the Honorable Lois Bloom, at the United States District Court at 225 Cadman Plaza East, Brooklyn, NY 11201, for an Order:

1. Holding Defendants in contempt for failure to serve post-judgment discovery responses;
2. Setting a purge condition of producing responses that the Court finds satisfactory;
3. Granting Plaintiff the costs of this application as a sanction, as damages under Local Rule 83.6, and as mandatory under Rule 37;
4. Setting a response time that permits the Court to hear this application at the already scheduled conference on September 13, 2022;<sup>1</sup>

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<sup>1</sup> Plaintiff will make this request by a separate letter motion, since it must be resolved before the underlying motion.

5. Find Defendants have waived all objections including privilege; and
6. Granting such further relief as the Court finds appropriate.

Dated: August 31, 2022

Respectfully Submitted,

/s/

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